UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING ANTITRUST LITIGATION

No. 21-MD-3010 (PKC)

This Motion Relates To:

THE STATE OF TEXAS, et al.,

Plaintiffs,

- against -

No. 21-CV-6841 (PKC)

GOOGLE LLC,

Defendants.

DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO SEAL LIMITED ITEMS IN THE SECOND AMENDED COMPLAINT

FRESHFIELDS BRUCKHAUS DERINGER US LLP

700 13th Street, NW, 10th Floor Washington, DC 20005
Telephone: (202) 777-4500

Fax: (202) 777-4555

WILSON SONSINI GOODRICH & ROSATI LLP

One Market Plaza, Spear Tower, Suite 3300 San Francisco, CA 94105 Telephone: (415) 947-2000 Fax: (415) 947-2099

Counsel for Defendant Google LLC

PLEASE TAKE NOTICE that, pursuant to the Court's Order dated September 7, 2021, ECF No. 142 at 2, Defendant Google LLC will seek an order before the Honorable P. Kevin Castel at a time and place convenient for the Court, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, permitting Plaintiffs to file a public version of the Second Amended Complaint, with narrowly tailored redactions, which are highlighted within the accompanying Exhibit A to the Declaration of Dan Taylor, in order to prevent the public disclosure of certain non-public information that will significantly harm the competitive interests of Google's business and the privacy interests of third parties.

Dated: September 17, 2021

Respectfully submitted,

/s/ Eric Mahr

Eric Mahr
Freshfields Bruckhaus Deringer US LLP
700 13th Street, NW
10th Floor
Washington, DC 20005
Telephone: (202) 777-4545

Email: Eric.Mahr@freshfields.com

Justina Sessions
Wilson Sonsini Goodrich & Rosati LLP
One Market Plaza, Spear Tower
Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2197

Email: jsessions@wsgr.com

Counsel for Defendant Google LLC